

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF PENNSYLVANIA**

**BESSEMER SYSTEM
FEDERAL CREDIT UNION,**
on behalf of itself and its members,

Plaintiff,

-against-

**FISERV SOLUTIONS, LLC, formerly
known as FISERV SOLUTIONS, INC., and
FISERV, INC.,**

Defendants.

No. 19 Civ. 624 (MJH)

**BESSEMER SYSTEM FEDERAL CREDIT UNION'S NOTICE OF WITHDRAWAL OF
MOTIONS FOR CONSIDERATION OF SEALING AND NOTICE OF PUBLIC FILING
OF DOCUMENTS PREVIOUSLY SUBJECT TO THOSE MOTIONS**

Bessemer System Federal Credit Union (“**Bessemer**”) withdraws its pending motions for consideration of sealing (ECF Nos. 19, 28).

To avoid potentially prejudicing defendants (collectively, “**Fiserv**”) by filing putatively confidential documents in the public record, Bessemer filed the motions as an accommodation to Fiserv to afford it an opportunity to be heard and to show cause, if any, for why those documents qualify for sealing.

The parties have engaged in meet and confer discussions regarding the confidentiality of the documents at issue and Fiserv’s proposed redactions. As a result of those discussions, Fiserv now consents to Bessemer publicly filing the documents at issue, provided that a portion of Fiserv’s bank account number is redacted from one document. Under FRCP 5.2 and LCvR 5.2, a sealing order is not necessary for the sole redaction now being requested by Fiserv. Accordingly, based on the parties’ agreement, Bessemer withdraws its motions for consideration of sealing.

Bessemer hereby publicly files the documents that were previously subject to the motions for consideration of sealing:

| <u>Exhibit</u> | <u>Description</u> | <u>ECF No.</u> |
|----------------|---|----------------|
| 1 | Exhibit 2 to Declaration of Joy E. Peterson | 18-2 |
| 2 | Exhibit 15 to Declaration of Joy E. Peterson | 18-16 |
| 3 | Exhibit 16 to Declaration of Joy E. Peterson | 18-17 |
| 4 | Exhibit 17 to Declaration of Joy E. Peterson | 18-18 |
| 5 | Exhibit 19 to Declaration of Joy E. Peterson | 18-20 |
| 6 | Exhibit 1 to First Amended Complaint and Demand for Jury Trial | 27-1 |
| 7 | Exhibit 4 to First Amended Complaint and Demand for Jury Trial | 27-5 |
| 8 | Exhibit 20 to First Amended Complaint and Demand for Jury Trial | 27-21 |
| 9 | Exhibit 21 to First Amended Complaint and Demand for Jury Trial | 27-22 |
| 10 | Exhibit 22 to First Amended Complaint and Demand for Jury Trial | 27-23 |

Bessemer does not intend to waive any rights or admit any facts by filing this notice, and Bessemer reserves all rights.

Dated: August 2, 2019

Respectfully submitted,

VEDDER PRICE P.C.

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